

226900

STATE OF SOUTH CAROLINA

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

(Caption of Case)

Complaint and Petition for Relief of  
BellSouth Telecommunications,  
Incorporated d/b/a AT&T Southeast d/  
b/a AT&T South Carolina v. dPi  
Teleconnect, LLC

COVER SHEET

DOCKET/NDI

NUMBER: 2010 - 18 - c

COPY

Posted: 10/23/10

(Please type or print)

Submitted by: John Pringle

Dept: S.A.

SC Bar Number: 11208

Address: P.O. Box 2285

Date: 11/23/10

Telephone: 343-1270

Columbia SC 29202

Time: 4:55

Fax:

Other:

Email: jpringle@ellislawhorne.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition

☐ Request for item to be placed on Commission's Agenda expeditiously

☐ Other:

INDUSTRY (Check one)

NATURE OF ACTION (Check all that apply)

☐ Electric

☐ Affidavit

☐ Letter

☐ Request

☐ Electric/Gas

☐ Agreement

☐ Memorandum

☐ Request for Certification

☐ Electric/Telecommunications

☐ Answer

☐ Motion

☐ Request for Investigation

☐ Electric/Water

☐ Appellate Review

☐ Objection

☐ Resale Agreement

☐ Electric/Water/Telecom.

☒ Application

☐ Petition

☐ Resale Amendment

☐ Electric/Water/Sewer

☐ Brief

☐ Petition for Reconsideration

☐ Reservation Letter

☐ Gas

☐ Certificate

☐ Petition for Rulemaking

☐ Response

☐ Railroad

☐ Comments

☐ Petition for Rule to Show Cause

☐ Response to Discovery

☐ Sewer

☐ Complaint

☐ Petition to Intervene

☐ Return to Petition

☒ Telecommunications

☐ Consent Order

☐ Petition to Intervene Out of Time

☐ Stipulation

☐ Transportation

☐ Discovery

☐ Prefiled Testimony

☐ Subpoena

☐ Water

☐ Exhibit

☐ Promotion

☐ Tariff

☐ Water/Sewer

☐ Expedited Consideration

☐ Proposed Order

☐ Other:

☐ Administrative Matter

☐ Interconnection Agreement

☐ Protest

☐ Other:

☐ Interconnection Amendment

☐ Publisher's Affidavit

☐ Late-Filed Exhibit

☐ Report

RECEIVED

NOV 23 2010

PSC SC  
CLERK'S OFFICE

# ELLIS:LAWHORNE

John J. Pringle, Jr.  
Direct dial: 803/343-1270  
[jpringle@ellislawhorne.com](mailto:jpringle@ellislawhorne.com)

November 23, 2010

RECEIVED

NOV 23 2010

PSC SC  
CLERK'S OFFICE

**FILED ELECTRONICALLY**

The Honorable Jocelyn G. Boyd  
Clerk  
South Carolina Public Service Commission  
Post Office Drawer 11649  
Columbia, South Carolina 29211

Re: Complaint and Petition for Relief of BellSouth Telecommunications, Inc. d/b/a AT&T Southeast d/b/a AT&T South Carolina v. Affordable Phone Services, Inc. d/b/a High Tech Communications, Dialtone & More, Inc., Tennessee Telephone Service, LLC d/b/a Freedom Communications USA, LLC, OneTone Telecom, Inc., dPi Teleconnect, LLC and Image Access, Inc., d/b/a New Phone  
Docket No. 2010-14-C, Docket No. 2010-15-C, Docket No. 2010-16-C,  
Docket No. 2010-17-C, Docket No. 2010-18-C, & Docket No. 2010-19-C

Dear Ms. Boyd:

Enclosed please find the **Verified Application for Admission *Pro Hac Vice* of Paul Francis Guarisco** for filing on behalf of the Respondent, Image Access, Inc., d/b/a New Phone in the above-referenced dockets. By copy of this letter, I am serving the originals of these documents, along with the requested filing fee with the Supreme Court and serving all parties of record with this document and I enclose my certificate of service to that effect.

If you have any questions or need additional information, please do not hesitate to contact me.

Sincerely,

s/ John J. Pringle, Jr.  
John J. Pringle, Jr.

cc: C. Lessie Hammonds, Esquire (via electronic mail service)  
Patrick W. Turner (via electronic mail service)  
Henry M. Walker, Esquire (via electronic mail service)  
Christopher Malish (via electronic mail service)  
Paul F. Guarisco, Esquire (via electronic mail service)

Enclosures

**VERIFIED APPLICATION FOR ADMISSION *PRO HAC VICE*  
IN THE STATE OF SOUTH CAROLINA**

BellSouth Telecommunications,  
Incorporated d/b/a AT&T Southeast d/b/a  
AT&T South Carolina

2010-14--19-C

South Carolina Public Service  
Commission

Plaintiff

Case No.

Court

vs.

Mailing Address of Court: Post Office Drawer 11649  
Columbia South Carolina 29211

Affordable Phone Services, Incorporated  
d/b/a High Tech Communications,  
Dialtone & More Incorporated, Tennessee  
Telephone Service, LLC d/b/a Freedom  
Communications USA, LLC, OneTone  
Telecom, Incorporated, dPi Teleconnect,  
LLC, and Image Access, Incorporated  
d/b/a New Phone

Defendant

Comes now Paul Francis Guarisco, applicant herein, and respectfully represents the following:

1. Applicant resides at:

17662 Chancellorsville Avenue

Street Address

Baton Rouge

East Baton Rouge Parish

LA

70817

City

County

State

Zip Code

225-752-1253

Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) Phelps

Dunbar, LLP, with offices at, at

11 City Plaza-400 Convention Street-Suite 1100

Street Address

Baton Rouge

East Baton Rouge Parish

LA

70821-4412

City

County

State

Zip Code

225-376-0241

Telephone

225-381-9197

Fax Number

3. Applicant has been retained personally or as a member of the above named law firm by Image Access, Inc. d/b/a NewPhone to provide legal representation in connection with the above case now pending before the above named court of the State of South Carolina.

4. Since April of 1993, applicant has been, and presently is, a member in good standing of the bar of the highest court of the District of Columbia or the State of LA where applicant regularly practices law. Attached is a certificate of good standing.

5. Applicant has been admitted to practice before the following courts: (List all of the following courts applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.)

Court:

Date Admitted:

Louisiana Supreme Court	April 23, 1993
United States District Court Eastern District of Louisiana	February 9, 1994
United States District Court Middle District of Louisiana	March 18, 1997

Applicant is presently a member in good standing of the bars of those courts listed above, except as listed below:  
(List any court named in the preceding paragraph that applicant is no longer admitted to practice before.)

6. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency, except as provided below (give particulars, e.g., jurisdiction, court, date):

None

7. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked, except as provided below (give particulars, e.g., date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation):

None

8. Applicant never has had any certificate or privilege to appear and practice before any administrative body suspended or revoked, except as provided below (give particulars, e.g., date, administrative body, date of suspension and reinstatement):

None

9. Local counsel of record associated with applicant in this case is John J. Pringle, Jr., of the Ellis, Lawhorne & Sims, P.A. law firm, which has offices at:

1501 Main Street, 5<sup>th</sup> Floor

Street Address

Richland

County

803/343-1270

Telephone

Columbia

City

South Carolina

State

29202

Zip Code

If applicable list all other firms/attorneys you are associated with in this matter

None

10. Applicant has previously filed an application to appear *pro hac vice* in the following South Carolina cases (give case name and status of litigation, date of application, local counsel of record in each case, and state whether application is pending or was granted).

None

11. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

12. Applicant respectfully requests to be admitted to practice in the above named court for this case only.

DATED this 19<sup>th</sup> day of November, 2010.

Paul Francis Guarisco  
APPLICANT

VERIFICATION

STATE OF LOUISIANA)

COUNTY OF EAST BATON ROUGE PARISH)

I, Paul Francis Guarisco, do hereby swear or affirm under penalty of perjury that I am the applicant in the above styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true.

Paul Francis Guarisco  
APPLICANT/AFFIANT

Subscribed and sworn to before me this 19<sup>th</sup> day of November, 2010.

William Bradley Kline

Notary Public for the State of LOUISIANA

My Commission Expires: \_\_\_\_\_

**William Bradley Kline**  
**Bar Roll No. 32530**  
**Notary Public, State of Louisiana**  
**My Commission is for Life**

LOCAL COUNSEL CONSENT

I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this 23rd day of November, 2010.

John G. Priddy  
LOCAL COUNSEL OF RECORD

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court by mail addressed to: South Carolina Supreme Court Office of Bar Admissions, PO Box 11330, Columbia, SC 29211, accompanied by payment of the \$250 filing fee payable to the South Carolina Supreme Court on this 23rd day of November, 2010.

John G. Priddy  
APPLICANT/AFFIANT

*Louisiana State Bar Association*

The Louisiana State Bar Association hereby certifies that \_\_\_\_\_

Mr. Paul Francis Guarisco

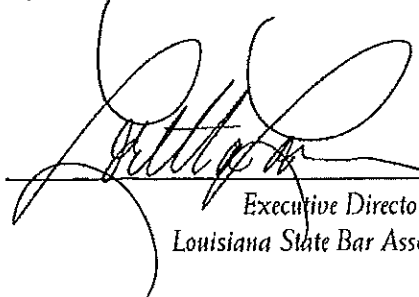
\_\_\_\_\_ 11 City Plaza  
whose address is \_\_\_\_\_ 400 Convention St Ste 1100

\_\_\_\_\_ Baton Rouge, LA 70821

is a member in good standing of the Louisiana State Bar Association as of this date, and that  
said person was duly admitted to practice in the courts of the State of Louisiana on the

\_\_\_\_\_ 23rd \_\_\_\_\_ day of \_\_\_\_\_ April \_\_\_\_\_ 1993

Given over my hand and the Seal of the Louisiana State Bar Association, this \_\_\_\_\_ 18th  
day of \_\_\_\_\_ November \_\_\_\_\_ 2010

  
\_\_\_\_\_  
Executive Director  
Louisiana State Bar Association

United States of America

State of Louisiana

Supreme Court of the State of Louisiana

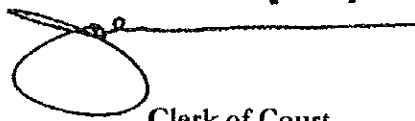
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I, JOHN TARLTON OLIVIER, Clerk of the Supreme Court of the State of Louisiana,  
do hereby certify that

*PAUL FRANCIS GUARISCO, ESQ., #22070*

was duly admitted and licensed to practice as an attorney and counselor at law in this Court  
and the several courts of the State of Louisiana, on the 23rd Day of April, 1993 A.D.; and is  
currently in good standing, and sufficiently qualified to perform the duties of an attorney and  
counselor at law.

IN WITNESS WHEREOF, I hereunto sign  
my name and affix the seal of this Court, at  
the City of New Orleans, this the 19th Day of  
November, 2010, A.D.

  
Clerk of Court  
Supreme Court of Louisiana





PHELPS DUNBAR, L.L.P.

## OPERATING ACCOUNT

CHECK NO.106583

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THIS MULTI-TONE AREA OF THE DOCUMENT CHANGES COLOR GRADUALLY AND EVENLY FROM DARK TO LIGHT WITH DARKER AREAS BOTH TOP AND BOTTOM

JP Morgan Chase Bank, N.A.  
New Orleans, Louisiana

**PHELPS DUNBAR, L.L.P.**  
365 Canal Street, Suite 2000  
New Orleans, Louisiana 70130-6534

CHECK NO. 106583

84-13/654

DATE 11/18/10

CHECK AMOUNT

\$\*\*\*\*\*250.00

PAY TWO HUNDRED FIFTY AND 00/100 DOLLAR

VOID AFTER 180 DAYS

TO THE  
ORDER OF

Supreme Court of South Carolina  
P.O. Box 11330  
Columbia, SC 29211

BAYON ROUGE OPERATING ACCOUNT

BATON ROUGE OPERATING

THE ORIGINAL DOCUMENT HAS A REFLECTIVE WATERMARK ON THE BACK. HOLD AT AN ANGLE TO VIEW WHEN CHECKING THE ENDORSEMENT.